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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

GEORGE JAMES,)	
KELLY JAMES)	
)	Case No. 13-CV-165-J
Plaintiffs,)	<u>LEAD CASE</u>
)	
v.)	Consolidated with:
)	Case No. 13-CV-218-J
QUANTUM FINANCIAL BUSINESS)	
SERVICES, LLC d/b/a QUANTUM)	
COLLECTION SERVICES, LLC d/b/a)	
CHECKRITE OF CORPUS CHRISTI;)	
)	
Defendants.)	

MOTION TO WITHDRAW

Pursuant to rule 83.12.3 of the Local Rules of the United States District Court for the District of Wyoming, the undersigned, Henry F. Bailey, Jr., Bailey, Stock and Harmon, P.C., counsel for Defendant in the above captioned action, hereby seeks leave to withdraw as counsel for Defendant on the following grounds:

1. As stated in the attached consent from Quantum's managing member, Michael McClain, Defendant is no longer able to fulfill the obligations of its engagement agreement with defense counsel, in that Defendant cannot pay attorney fees and expenses to defend itself in this action.

2. A substantial amount of work remains to be done in this case to adequately conduct discovery and prepare for trial. Since a substantial commitment of time and resources will be required to defend Quantum and because Defendant is unable to pay for the services of defense counsel, continued representation would create an unreasonable financial burden on the undersigned counsel and his law firm.

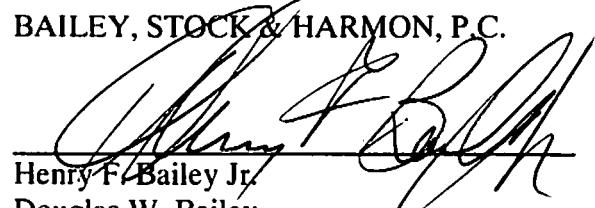
3. Appropriate notice has been provided to the client and the client has consented to this withdrawal. The client is fully aware of the consequences of withdrawal, including the possibility of a judgment being entered against the client if the client does not hire substitute counsel.

4. This withdrawal complies with rule 1.16 of the Rules of Professional Conduct.

5. Attached hereto and incorporated by this reference is the client's consent to withdrawal along with the Notice of Withdrawal required by rule 83.12.3(b)(1).

Dated this 3rd day of March, 2014.

BAILEY, STOCK & HARMON, P.C.


Henry F. Bailey Jr.
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CERTIFICATE OF SERVICE

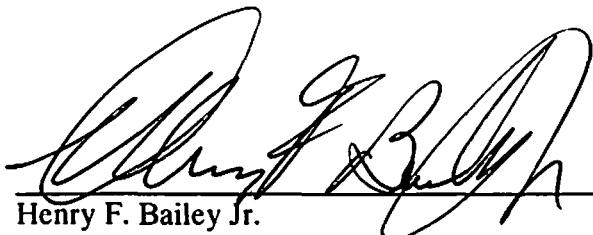
I hereby certify that a true and correct copy of the **Motion to Withdraw** was served in the manner defined below on March 3, 2014 to the following:

George & Kelly James
3422 Cribbon Avenue
Cheyenne, WY 82001

U.S. Mail – postage prepaid
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Henry F. Bailey Jr.